Metcalf Energy Center, LLC

TV Tracking #: 945 (Semi-Annual)

1. ☐ RECEIVED IN ENFORCEMENT: 07/29/2024

1 Blanchard Road
Coyote, CA 95013

July 29, 2024

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105-2097
Attn: Title V Reports

Re: Metcalf Energy Center #B2183
Title V CEMS Semi-Annual Monitoring Report
Reporting Period: January 1, 2024 – June 30, 2024

To Whom It May Concern:

Enclosed is the Title V CEMS Semi-Annual Monitoring Report for the Metcalf Energy Center ("MEC") for the reporting period from January 1, 2024 – June 30, 2024.

MEC is currently in compliance with the District CEMS regulations. MEC maintained intermittent compliance with the monitoring requirements listed in the Title V permit for MEC during this reporting period. Please refer to Appendix A for details.

By signing this report, I am certifying that based on information and belief formed after reasonable inquiry, the statements and information in the attached report are true, accurate, and complete, apart from one event.

If you have any questions or require additional information, do not hesitate to contact Rosemary Silva, EHS Project Manager III, at (408) 361-4954.

Sincerely,

Signed by:
kevin karwick
C4DF598531F14B6...

Kevin Karwick
General Manager and
Designated Representative/Responsible Official
Metcalf Energy Center, LLC.

Enclosures: Title V Semi-Annual Report

cc: Region 9 EPA

Metcalf Energy Center
Title V CEMS Semi-Annual Monitoring Report
January 1, 2024, to June 30, 2024

Table VII - A

Applicable Limits and Compliance Monitoring Requirements

S-1, GAS TURBINE #1

S-2, GAS TURBINE #2

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
NOx	BAAQMD 9-3-303	N	125 ppm	BAAQMD 1-520.1	C	CEM	X	
NOx	BAAQMD 9-9-301.1.3	N	9 ppmv @ 15% O2, dry	BAAQMD 9-9-501	C	CEM	X	
NOx	SIP 9-9-301.3	Y	9 ppmv @ 15% O2, dry	SIP 9-9-501	C	CEM	X	
NOx	BAAQMD 9-9-301.2	N	0.15 LB/MMBTU or 5 ppmv	BAAQMD 9-9-501	C	CEM	X	
NOx	NSPS, 40 CFR 60.332 (a)(1)	Y	75 ppmv @ 15% O2, dry, 4-hour rolling average	NSPS 40 CFR 60.334(c.)	C	CEM	X	
		Y	None	40 CFR 75.10	C	CEM	X	
NOx	BAAQMD condition #18310, part 20a	Y	19.2 lb./hr. for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM		X[1]
NOx	BAAQMD condition #18310, part 20a	Y	19.2 lb./hr. for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load	X	
NOx	BAAQMD condition #18310, part 20a	Y	0.00904 lb./MM BTU for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM		X[1]
NOx	BAAQMD condition #18310, part 20a	Y	0.00904 lb/MM BTU for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load	X	

[1] On March 11, 2024, the facility experienced an indicated excess of the following NOX emission limits of the Title V permit: 19.2 pounds per hour (Condition 20.a), 0.00904 lbs./MMBtu (Condition 20.a), and 2.5 ppm 1-hour average, corrected to 15% O2 (Condition 20.b). Refer to Appendix A for additional information.

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Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
NOx	BAAQMD condition #18310, part 20b	Y	2.5 ppmv, @ 15% O2, dry, for each turbine/HRSG powertrain, 1-hr average except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load	**X**	
NOx	BAAQMD condition #18310, part 20b	Y	2.5 ppmv, @ 15% O2, dry, for each turbine/HRSG powertrain, 1-hr average except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM		**X**[1]
NOx	BAAQMD condition #18310, part 21	Y	240 lb./gas turbine start-up	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
NOx	BAAQMD condition #18310, part 21	Y	480 lb./hr. during gas turbine cold start-up or combustor tuning period	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
NOx	BAAQMD condition #18310, part 21	Y	80 lb./gas turbine shutdown	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
NOx	BAAQMD condition #18310, part 24a	Y	1362.6 lb./day for S-1, S-3 Gas Turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
NOx	BAAQMD condition #18310, part 25a	Y	123.4 ton/yr for S-1, S-3 Gas Turbines and S-2, S-4 HRSGs, combined (including emissions from commissioning period)	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
CO	BAAQMD condition #18310, part 20c	Y	18.7 lb/hr, for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load and minimum load	**X**	
CO	BAAQMD condition #18310, part 20c	Y	18.7 lb/hr, for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM	**X**	

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Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
CO	BAAQMD condition #18310, part 20d	Y	0.0088 lb/MM BTU for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load and minimum load	X	
CO	BAAQMD condition #18310, part 20d	Y	0.0088 lb/MM BTU for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM	X	
CO	BAAQMD condition #18310, part 20d	Y	4 ppmv @ 15% O2, dry, for each turbine/HRSG powertrain, 3-hr average, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load and minimum load	X	
CO	BAAQMD condition #18310, part 20d	Y	4 ppmv @ 15% O2, dry, for each turbine/HRSG powertrain, 3-hr average, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM	X	
CO	BAAQMD condition #18310, part 20d	Y	4 ppmv @ 15% O2, dry, for each turbine/HRSG powertrain, 3-hr average, except during turbine startup and shutdown	40 CFR 64.3 (b)(4)(ii)	At least 4 times per hour (CAM Plan)	CEM	X	
CO	BAAQMD condition #18310, part 21	Y	2,514 lb/gas turbine startup	BAAQMD condition #18310, Part 27b	C	CEM	X	
CO	BAAQMD condition #18310, part 21	Y	5028 lb/hr during gas turbine cold start-up or combustor tuning period	BAAQMD condition #18310, Part 27b	C	CEM	X	
CO	BAAQMD condition #18310, part 21	Y	902 lb/gas turbine shutdown	BAAQMD condition #18310, Part 27b	C	CEM	X	
CO	BAAQMD condition #18310, part 24b	Y	7,891.1 lb/day for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, Part 27b	C	CEM	X	

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Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
CO	BAAQMD condition #18310, part 25b	Y	588 ton/yr for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined (includes emissions from commissioning period)	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
CO_2		Y	None	40 CFR 75.10	C	fuel flow monitor and CO2 calculation	**X**	
SO_2	BAAQMD 9-1-301	Y	GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		**X**	
SO_2	BAAQMD 9-1-302	Y	300 ppm (dry)		N		**X**	
SO_2	NSPS 40 CFR 60.333(a)	Y	0.015% (vol.) @ 15% O_2 (dry)	NSPS 40 CFR 60.334(h)	N		**X**	
SO_2	NSPS 40 CFR 60.333(b)	Y	Total sulfur content of fuel not to exceed 0.8 percent by weight (8000 ppmw)	NSPS 40 CFR 60.334(h)(3)(ii) and BAAQMD condition #18310, Part 45	P/M	Fuel sulfur content testing	**X**	
SO_2		Y	None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3	P/A	Fuel measurements, calculations	**X**	
SO2	BAAQMD condition #18310, part 20g	Y	1.28 lb/hr, for each turbine/HRSH powertrain	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	**X**	
SO2	BAAQMD condition #18310, part 20g	Y	1.28 lb/hr, for each turbine/HRSH powertrain	BAAQMD condition #18310, part 28	P/D	Records, calculations	**X**	
SO2	BAAQMD condition #18310, part 20g	Y	0.0006lb/MM BTU, for each turbine/HRSG powertrain	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	**X**	

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							Yes	No
SO2	BAAQMD condition #18310, part 20g	Y	0.0006lb/MM BTU, for each turbine/HRSG powertrain	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
SO2	BAAQMD condition #18310, part 24e	Y	57.9 lb/day for each turbine/HRSG powertrain	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
SO2	BAAQMD condition #18310, part 25e	Y	10.6 ton /yr for each turbine/HRSG powertrain (includes emissions from commissioning period)	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
Opacity	BAAQMD 6-1-301	N	> Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
Opacity	SIP 6-301	Y	> Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
FP	BAAQMD 6-1-310.3	N	0.15 grain/dscf @ 6% O2		N		X	
FP	SIP 6-310.3	Y	0.15 grain/dscf @ 6% O2		N		X	
PM_{10}	BAAQMD condition #18310, part 20h	Y	9 lb/hr, for each turbine/HRSG powertrain	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
PM_{10}	BAAQMD condition #18310, part 20h	Y	0.00452 lb/MM BTU, for each turbine/HRSG powertrain	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
PM_{10}	BAAQMD condition #18310, part 24d	Y	510 lb/day for S-1, S-3 Gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
PM_{10}	BAAQMD condition #18310, part 25d	Y	83.34 ton/yr for S-1, S-3 Gas turbines and S-2, S-4 HRSGs, combined (including emissions from commissioning period)	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	

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Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
POC	BAAQMD condition #18310, part 20f	Y	2.7 lb/hr (as CH4) for each turbine/HRSG powertrain except during turbine startup and shut down	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
POC	BAAQMD condition #18310, part 20f	Y	0.00126 lb/MM BTU (as CH4) for each turbine/HRSG powertrain except during turbine startup and shut down	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
POC	BAAQMD condition #18310, part 21	Y	48 lb/gas turbine startup	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
POC	BAAQMD condition #18310, part 21	Y	16 lb/gas turbine shutdown	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
POC	BAAQMD condition #18310, part 21	Y	96 lb/hr during gas turbine cold start up or combustor tuning period	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
POC	BAAQMD condition #18310, part 24c	Y	230.2 lb/day (as CH4) for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
POC	BAAQMD condition #18310, part 25c	Y	28 ton/yr) for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined (including emissions from commissioning period)	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
NH_3	BAAQMD condition #18310, part 20e	N	5 ppmv, @ 15% O2 dry, averaged over 3 hrs for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, part 27c	C	Ammonia injection rate monitor	X	
Formal-dehyde	BAAQMD condition #18310, part 26a	N	3796 lb/yr for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 29	P/D	Records, calculations	X	

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Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
Formal-dehyde	BAAQMD condition #18310, part 26a	N	3796 lb/yr for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 33	P/every two years on P-1 or P-2	Source Test	X	
Benzene	BAAQMD condition #18310, part 26b	N	480 lb/yr for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 29	P/D	Records, calculations	X	
Benzene	BAAQMD condition #18310, part 26b	N	480 lb/yr for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 33	P/every two years on P-1 or P-2	Source Test	X	
Specific PAH Compounds	BAAQMD condition #18310, part 26c	N	22.8 lb/yr for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 29	P/D	Records, calculations	X	
Specific PAH Compounds	BAAQMD condition #18310, part 26c	N	22.8 lb/yr for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 33	P/every two years on P-1 or P-2	Source Test	X	
Heat input limit	BAAQMD condition #18310, part 14	Y	2,124 MM BTU/hr (HHV), 3-hr average for each turbine/HRSG powertrain	BAAQMD condition #18310, part 27a	C	Fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #18310, part 15	Y	49,908 MM BTU/calendar day (HHV), for each turbine/HRSG powertrain	BAAQMD condition #18310, part 27a	C	Fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #18310, part 16	Y	35,274,060 MM BTU/yr (HHV) for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 27a	C	Fuel meter, firing monitor, calculations	X	
Cold Start-Up, Combustor Tuning Firing Limit	BAAQMD condition #18310, part 48	Y	30 firing hours per year for S-1 and S-3 gas turbines, combined for purposes of cold start-up or combustor tuning	BAAQMD condition #18310, part 49	P/E	Recordkeeping	X	

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Table VII - B

Applicable Limits and Compliance Monitoring Requirements

S-3, HEAT RECOVERY STEAM GENERATOR #1

S-4, HEAT RECOVERY STEAM GENERATOR #2

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
NOx	BAAQMD 9-9-301.1.3	N	9 ppmv @ 15% O2, dry	BAAQMD 9-9-501	C	CEM	X	
NOx	SIP 9-9-301.3	Y	9 ppmv @ 15% O2, dry	SIP 9-9-501	C	CEM	X	
NOx	BAAQMD 9-9-301.2	N	0.15 LB/MMBTU or 5 ppmv	BAAQMD 9-9-501	C	CEM	X	
NOx	NSPS, 40 CFR 60.44b (a)(4)(i)	Y	0.2 lb/ MM BTU except, during start-up, shutdown or malfunction	NSPS 40 CFR 60.48b (b)(2) and BAAQMD Condition #18310, part 27b	C	CEM	X	
NOx	NSPS, 40 CFR 60.332 (a)(1)	Y	75 ppmv @ 15% O2, dry, 4-hour rolling average	NSPS 40 CFR 60.334(c.) and BAAQMD Condition #18310, part 27b	C	CEM	X	
NOx		Y	None	40 CFR 75.10	C	CEM	X	
NOx	BAAQMD condition #18310, part 20a	Y	19.2 lb/hr for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM	X	
NOx	BAAQMD condition #18310, part 20a	Y	19.2 lb/hr for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load	X	
NOx	BAAQMD condition #18310, part 20a	Y	0.00904 lb/MM BTU for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM	X	

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Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
NOx	BAAQMD condition #18310, part 20a	Y	0.00904 lb/MM BTU for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load	**X**	
NOx	BAAQMD condition #18310, part 20b	Y	2.5 ppmv, @ 15% O2, dry, for each turbine/HRSG powertrain, 1-hr average except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load	**X**	
NOx	BAAQMD condition #18310, part 20b	Y	2.5 ppmv, @ 15% O2, dry, for each turbine/HRSG powertrain, 1-hr average except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
NOx	BAAQMD condition #18310, part 24a	Y	1362.6 lb/day for S-1, S-3 Gas Turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
NOx	BAAQMD condition #18310, part 25a	Y	123.4 ton/yr for S-1, S-3 Gas Turbines and S-2, S-4 HRSGs, combined (including emissions from commissioning period)	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
CO	BAAQMD condition #18310, part 20c	Y	18.7 lb/hr, for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load and minimum load	**X**	
CO	BAAQMD condition #18310, part 20c	Y	18.7 lb/hr, for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
CO	BAAQMD condition #18310, part 20d	Y	0.0088 lb/MM BTU for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load and minimum load	**X**	

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Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
CO	BAAQMD condition #18310, part 20d	Y	0.0088 lb/MM BTU for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
CO	BAAQMD condition #18310, part 20d	Y	4 ppmv @ 15% O2, dry, for each turbine/HRSG powertrain, 3-hr average, except during turbine startup and shutdown	BAAQMD condition #18310, Part 31	P/A	Source Test at maximum load and minimum load	**X**	
CO	BAAQMD condition #18310, part 20d	Y	4 ppmv @ 15% O2, dry, for each turbine/HRSG powertrain, 3-hr average, except during turbine startup and shutdown	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
CO	BAAQMD condition #18310, part 24b	Y	7,891.1 lb/day for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
CO	BAAQMD condition #18310, part 25b	Y	588 ton/yr for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined (includes emissions from commissioning period)	BAAQMD condition #18310, Part 27b	C	CEM	**X**	
CO_2		Y	None	40 CFR 75.10	C	fuel flow monitor and CO2 calculation	**X**	
SO_2	BAAQMD 9-1-301	Y	GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		**X**	
SO_2	BAAQMD 9-1-302	Y	300 ppm (dry)		N		**X**	
SO_2	NSPS 40 CFR 60.333(a)	Y	0.015% (vol.) @ 15% O_2 (dry)	NSPS 40 CFR 60.334(h)	N		**X**	

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							Yes	No
SO_2	NSPS 40 CFR 60.333(b)	Y	Total sulfur content of fuel not to exceed 0.8 percent by weight (8000 ppmw)	NSPS 40 CFR 60.334(h)(3)(ii) and BAAQMD condition #18310, Part 45	P/M	Fuel sulfur content testing	X	
SO_2		Y	None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3	P/A	Fuel measurements, calculations	X	
SO2	BAAQMD condition #18310, part 20g	Y	1.28 lb/hr, for each turbine/HRSH powertrain	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
SO2	BAAQMD condition #18310, part 20g	Y	1.28 lb/hr, for each turbine/HRSH powertrain	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
SO2	BAAQMD condition #18310, part 20g	Y	0.0006lb/MM BTU, for each turbine/HRSG powertrain	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
SO2	BAAQMD condition #18310, part 20g	Y	0.0006lb/MM BTU, for each turbine/HRSG powertrain	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
SO2	BAAQMD condition #18310, part 24e	Y	57.9 lb/day for each turbine/HRSG powertrain	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
SO2	BAAQMD condition #18310, part 25e	Y	10.6 ton /yr for each turbine/HRSG powertrain (includes emissions from commissioning period)	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	
Opacity	BAAQMD 6-1-301	N	> Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
Opacity	SIP 6-301	Y	> Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	

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Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
FP	BAAQMD 6-1-310.3	N	0.15 grain/dscf @ 6% O2		N		X	
FP	SIP 6-310.3	Y	0.15 grain/dscf @ 6% O2		N		X	
PM	NSPS 40 CFR 60.42a (b)	Y	< 20% opacity, 6-minute average, except one six-minute period/hr. up to 27% opacity		N		X	
PM_{10}	BAAQMD condition #18310, part 20h	Y	9 lb./hr., for each turbine/HRSG powertrain	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
PM_{10}	BAAQMD condition #18310, part 20h	Y	0.00452 lb./MM BTU, for each turbine/HRSG powertrain	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
PM_{10}	BAAQMD condition #18310, part 24d	Y	510 lb./day for S-1, S-3 Gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 24	P/D	Records, calculations	X	
PM_{10}	BAAQMD condition #18310, part 25d	Y	83.34 ton/yr. for S-1, S-3 Gas turbines and S-2, S-4 HRSGs, combined (including emissions from commissioning period)	BAAQMD condition #18310, part 25	P/D	Records, calculations	X	
POC	BAAQMD condition #18310, part 20f	Y	2.7 lb./hr. (as CH4) for each turbine/HRSG powertrain except during turbine startup and shut down	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
POC	BAAQMD condition #18310, part 20f	Y	0.00126 lb./MM BTU (as CH4) for each turbine/HRSG powertrain except during turbine startup and shut down	BAAQMD condition #18310, part 31	P/A	Source test at maximum load	X	
POC	BAAQMD condition #18310, part 24c	Y	230.2 lb./day (as CH4) for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 28	P/D	Records, calculations	X	

Metcalf Energy Center
Title V CEMS Semi-Annual Monitoring Report
January 1, 2024, to June 30, 2024

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
POC	BAAQMD condition #18310, part 25c	Y	28 ton/yr.) for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined (including emissions from commissioning period)	BAAQMD condition #18310, part 28	P/D	Records, calculations	**X**	
NH_3	BAAQMD condition #18310, part 20e	N	5 ppmv, @ 15% O2 dry, averaged over 3 hrs. for each turbine/HRSG powertrain, except during turbine startup and shutdown	BAAQMD condition #18310, part 27c	C	Ammonia injection rate monitor	**X**	
Formalde-hyde	BAAQMD condition #18310, part 26a	N	3796 lb./yr. for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 29	P/D	Records, calculations	**X**	
Formalde-hyde	BAAQMD condition #18310, part 26a	N	3796 lb./yr. for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 33	P/every two years on P-1 or P-2	Source Test	**X**	
Benzene	BAAQMD condition #18310, part 26b	N	480 lb./yr. for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 29	P/D	Records, calculations	**X**	
Benzene	BAAQMD condition #18310, part 26b	N	480 lb./yr. for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 33	P/every two years on P-1 or P-2	Source Test	**X**	
Specific PAH Compounds	BAAQMD condition #18310, part 26c	N	22.8 lb./yr. for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 29	P/D	Records, calculations	**X**	
Specific PAH Compounds	BAAQMD condition #18310, part 26c	N	22.8 lb./yr. for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 33	P/every two years on P-1 or P-2	Source Test	**X**	
Heat input limit	BAAQMD condition #18310, part	Y	2,124 MM BTU/hr. (HHV), 3-hr average for each turbine/HRSG powertrain	BAAQMD condition #18310, part 27a	C	Fuel meter, firing monitor,	**X**	

	14					calculations		
Heat input limit	BAAQMD condition #18310, part 15	Y	49,908 MM BTU/calendar day (HHV), for each turbine/HRSG powertrain	BAAQMD condition #18310, part 27a	C	Fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #18310, part 16	Y	35,274,060 MM BTU/yr. (HHV) for S-1, S-3 gas turbines and S-2, S-4 HRSGs, combined	BAAQMD condition #18310, part 27a	C	Fuel meter, firing monitor, calculations	X	
Prohibited firing	BAAQMD condition #18310, part 17	Y	Each HRSG duct burner may not be fired unless its associated gas turbine is being fired	BAAQMD condition #18310, part 27a	C	Fuel meter, firing monitor, calculations	X	

Metcalf Energy Center
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Table VII – C

Applicable Limits and Compliance Monitoring Requirements

S-5 COOLING TOWER

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
Opacity	BAAQMD 6-1-301	N	>Ringelmann No.1 for no more than 3 minutes in any hour		N		**X**	
FP	BAAQMD 6-1-310	N	0.15 gr/dscf		N		**X**	
Opacity	SIP 6-301	Y	>Ringelmann No.1 for no more than 3 minutes in any hour		N		**X**	
FP	SIP 6-310	Y	0.15 gr/dscf		N		**X**	
Drift Rate	BAAQMD Condition #18310, part 46	Y	0.0005%	BAAQMD Condition #18310, part 46	P	Initial Source Test	**X**	
Total Dissolved Solids	BAAQMD Condition #18310, part 46	Y	5438 ppmw (mg/l)	BAAQMD Condition #18310, part 46	P/D	Sampling and Testing of cooling tower water	**X**[2]	

[2]On May 1, 2024, during a routine review of the cooling tower TDS data, it was discovered that the samples collected during April 25th to April 30th, 2024, showed negative values, due to a lack of water in the sampling system. During that period, the facility, including the cooling tower, did not operate and remains in a maintenance outage.

Metcalf Energy Center
Title V CEMS Semi-Annual Monitoring Report
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Table VII – D

Applicable Limits and Compliance Monitoring Requirements

S-6 STATIONARY STANDBY GENERATOR SET

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
Opacity	BAAQMD 6-1-301	N	>Ringelmann No.1 for no more than 3 minutes in any hour		N		**SOURCE NOT COMMISSIONED**	
Opacity	SIP 6-301	Y	>Ringelmann No.1 for no more than 3 minutes in any hour		N			
FP	BAAQMD 6-1-310.3	N	0.15 gr/dscf @ 6% O2		N			
FP	SIP 6-310.3	Y	0.15 gr/dscf @ 6% O2		N			
SO_2	BAAQMD 9-1-301	Y	GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N			
SO_2	BAAQMD 9-1-302	Y	300 ppm (dry)		N			
Heat Input Limit	BAAQMD Condition #22231-part 1	Y	14.1 MM BTU/hr.		N			
Reliability Related activities	BAAQMD Condition #22231-part 2	Y	100 hours per calendar year	BAAQMD Condition #22231-part 6	P/E	Recordkeeping		
NOx, CO and POC	BAAQMD Condition #22231-part 3	Y	1.0 g NOx/bhp-hr. 2.75 g CO/bhp-hr. 1.0 g POC/bhp-hr.		N			

Metcalf Energy Center
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January 1, 2024, to June 30, 2024

Table VII – E

Applicable Limits and Compliance Monitoring Requirements

S-7 FIRE PUMP DIESEL ENGINE

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
							Yes	No
Opacity	BAAQMD 6-1-301	N	>Ringelmann No.2 for no more than 3 minutes in any hour		N		**X**	
Opacity	SIP 6-301	Y	>Ringelmann No.2 for no more than 3 minutes in any hour		N		**X**	
FP	BAAQMD 6-1-310.3	N	0.15 gr/dscf @ 6% O2		N		**X**	
FP	SIP 6-310.3	Y	0.15 gr/dscf @ 6% O2		N		**X**	
SO_2	BAAQMD 9-1-301	Y	GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		**X**	
Fuel Sulfur Content	BAAQMD 9-1-304	Y	Sulfur Content ≤ 0.5% by weight		N		**X**	
SO_2	BAAQMD Condition #19610, part 39	N	Sulfur content of fuel less than 0.05% by weight	BAAQMD Condition #19610, part 39	P/E		**X**	
Reliability Related activities	BAAQMD Condition #21917-part 1	Y	30 hours per calendar year	BAAQMD Condition #21917 part 2, 3	P/E	Totalizing Meter, record keeping	**X**	

Appendix A

Metcalf Energy Center, LLC

1 Blanchard Road
Coyote, CA 95013

April 9, 2024

Director, Enforcement and Compliance Division
Bay Area Air Quality Management District, Suite 600
375 Beale Street
San Francisco, CA 94105-2066
Attn: Jeffrey Gove
compliance@baaqmd.gov

RE: Metcalf Energy Center, LLC., Permit No. B2183
Major Facility Review Permit (Title V Permit)
30-Day Title V Non-Compliance Report
RCA ID: 200236

Dear Mr. Gove,

In accordance with the Major Facility Review Permit ("Title V Permit") for Metcalf Energy Center, LLC (the "Facility"), this letter is intended to satisfy the 30-day follow-up reporting requirement as required by Section I.F. of the Title V Permit, which requires the reporting of all non-compliance instances of the Title V Permit in writing within 30 days of discovery of such non-compliance.

The RCA was submitted on March 13, 2024, and the Title V 10-day initial notification was submitted to the District on March 14, 2024.

On March 11, 2024, the facility experienced an indicated excess of the following NO_X emission limits of the Title V permit: 19.2 pounds per hour (Condition 20.a), 0.00904 lbs./MMBtu (Condition 20.a), and 2.5 ppm 1-hour average, corrected to 15% O_2 (Condition 20.b). All evidence indicates that this event was caused by a loose sample tube connected to the O_2 analyzer. The details of the troubleshooting and event are described in the event description section below. The Facility believes that these values do not accurately represent actual stack emissions and that no excess emissions occurred during this event.

Event Description

On March 11, 2024, the Facility experienced issues with the Combustion Turbine 1 (CT-1) O_2 analyzer after it failed a calibration check out of control (OOC). Subsequent to successfully passing a 2nd calibration check, the analyzer recorded 11 minutes of O_2 concentration data that were not representative of combustion gas as shown in Attachment 1. The high O_2 data resulted in high NO_X corrected values that led to the indicated excess emissions.

After recording the high O_2 data the analyzer was put into maintenance for troubleshooting. During troubleshooting, after the analyzer was challenged with calibration gas, it began reporting data typical of combustion gas. The system was returned to service and NOx data were within normal range.

On March 12, 2024, while the unit was down, Facility staff continued to troubleshoot the O_2 analyzer since the cause of the failed calibration had not been determined. During this process, the analyzer OEM (Thermo) was contacted for guidance, and they advised checking the analyzer for loose connections. Upon inspection, staff found a loose connection on the O_2 sensor. After the loose sample tube was tightened, the O_2 values became stable, and a calibration check was successfully completed. No further issues have been noted.

The following is a chronology of the event:

March 11, 2024

- 13:17-13:41: O_2 analyzer fails calibration check OOC.
- 13:44-13:55: O_2 analyzer passes calibration check.
- 13:56-14:06: O_2 analyzer records data (> 24%) that is non-representative of combustion gas
- 14:07: O_2 analyzer placed into "Maintenance Mode" to troubleshoot cause of the elevated O_2 readings. During troubleshooting, the analyzer began reading O_2 data within normal range after analyzer was challenged with calibration gas.
- 15:12: O_2 analyzer returned to service.

March 12, 2024

- 06:30-14:10: staff continued troubleshooting O_2 analyzer. Contacted Thermo. Tightened sample tube on the O_2 sensor.
- 14:11: CEMS was placed back into "Service"
- 14:12-14:27: Initiated calibration check on the analyzer.

Corrective Actions

The Facility determined that a loose sample tube connected to the O_2 analyzer was the cause of the calibration failure and non-representative O_2 readings. The connection was tightened.

Compliance Status

The Facility was in full compliance with its air permit throughout the duration of this event. The 11 minutes of non-representative data will be invalidated and the database rebuilt upon District approval.

Investigation and Cause Determination

The O_2 concentration in combustion exhaust must be below the ambient O_2 concentration of 21% since oxygen is consumed to support combustion. The standard default O_2 concentration for combustion turbine exhaust is 15%, and the typical Facility exhaust gas O_2 concentration during normal operations is 14%. The O_2 data recorded during the event that led to the indicated NO_X excess emissions was greater than 24%. The Facility has determined that the loose sample tube connected to the analyzer affected the ability of the O_2 analyzer to accurately measure the O_2 concentration data.

Based on the investigation, it has been determined that the analyzer recorded O_2 data that was not representative of actual oxygen concentrations and the Facility did not emit excess emissions.

Preventative Actions

The onsite technicians perform quarterly CEMS analyzer preventive maintenance. The maintenance procedures have been updated to include a step to check all analyzer sample connections for loose fittings and make necessary adjustments. Furthermore, the Facility will utilize high O_2 alarms to alert operations when the analyzers are recording high indicated O_2 concentrations in the future.

Certification

As the Responsible Official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

If you have any questions or require additional information, please contact Rosemary Silva, EHS Specialist, at 408-361-4954.

Sincerely,

DocuSigned by:
kevin karwick
C4DF598531F14B6...

Kevin Karwick
General Manager
Metcalf Energy Center, LLC

Cc:	Erin Phillips	BAAQMD	via email attachment
	Anwar Ali	CEC AQ-34	via email attachment
	EHSWalnutCreek@calpine.com		via email attachment
	CICS Records INC103103		

Attachments

Attachment 1: Hourly Emissions Report_031124

Attachment 1

Metcalf

San Jose, CA

Turbine-1 Hourly Emissions Report

March 11, 2024 - Hour 14

1-Hr Emission Limits		3-Hr Rolling Emission Limits		4-Hr Rolling (Subpart GG) Emission Limit
NOx ppm @15% O2 - 2.5 *	NOx lb/hr - 19.2 *	CO ppm @15% O2 - 4 *	CO lb/hr - 18.7 *	NOx ppm @15% O2 - 100
NOx lb/mmBtu - 0.00904 *		CO lb/mmBtu - 0.0088 *	NH3 Slip ppm @15% O2 - 5 *	

Minute	O2%	NOx ppm	NOx ppm @15% O2	NOx lb/mmBtu	NOx lb/hr	CO ppm	CO ppm @15% O2	CO lb/mmBtu	CO lb/hr	NH3 ppm Slip @15% O2	SCR NOx ppm	Process Status
14:00	24.67	2.38	7.39	0.02717	55.48	0.08	0.25	0.0006	1.23	0.00	21.4	Normal
14:01	24.66	2.50	7.76	0.02854	58.08	0.23	0.71	0.0016	3.26	0.00	21.2	Normal
14:02	24.64	2.51	7.79	0.02865	57.91	0.17	0.53	0.0012	2.43	0.00	20.2	Normal
14:03	24.64	2.60	8.07	0.02968	60.28	0.23	0.71	0.0016	3.25	0.00	20.1	Normal
14:04	24.65	2.92	9.07	0.03333	68.14	0.17	0.53	0.0012	2.46	0.00	20.5	Normal
14:05	24.67	3.36	10.43	0.03835	78.86	0.10	0.31	0.0007	1.44	0.00	21.2	Normal
14:06	24.70	3.86	11.99	0.04406	90.60	0.10	0.31	0.0007	1.44	0.00	21.8	Normal
14:07	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:08	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:09	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:10	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:11	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:12	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:13	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:14	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:15	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:16	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:17	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:18	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:19	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:20	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:21	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:22	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:23	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:24	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:25	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:26	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:27	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:28	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:29	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:30	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal

Minute	O2%	NOx ppm	NOx ppm @15% O2	NOx lb/mmBtu	NOx lb/hr	CO ppm	CO ppm @15% O2	CO lb/mmBtu	CO lb/hr	NH3 ppm Slip @15% O2	SCR NOx ppm	Process Status
14:31	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:32	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:33	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:34	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:35	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:36	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:37	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:38	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:39	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:40	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:41	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:42	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:43	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:44	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:45	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:46	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:47	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:48	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:49	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:50	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:51	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:52	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:53	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:54	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:55	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:56	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:57	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:58	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
14:59	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	**Maint**	Normal
Average	24.7	2.9	**8.9 ***	**0.03310 ***		0.2	0.6	0.0014		0.0	20.9	Normal
Total					**66.06 ***				2.79			
4-Hr Rlng			7.2									
3-Hr Rlng							0.3 *	0.0006 *	1.14 *	1.17 *		

** - Excluding Startup and Shutdown*

Metcalf Energy Center, LLC.

1 Blanchard Road
Coyote, CA 95013

May 9, 2024

Director, Enforcement and Compliance Division
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
compliance@baaqmd.gov

RE: **Metcalf Energy Center, Permit No. B2183**
Major Facility Review Permit (Title V Permit)
10-Day Title V Non-Compliance Report
30-Day Title V Follow-Up Report

To Whom It May Concern:

In accordance with the Major Facility Review Permit (Title V Permit) for the Metcalf Energy Center (the "Facility"), this letter is to advise you of an instance of potential non-compliance as required by Section I. F. of the Title V Permit, which requires the reporting of all non-compliance instances of the Title V Permit in writing within 10 days. It is also intended to satisfy the 30-day follow-up reporting requirement as required by Section I.F. of the Title V Permit.

On May 1, 2024, during a routine review of the cooling tower TDS data, it was discovered that the samples collected during April 25th to April 30th, 2024, showed negative values, due to a lack of water in the sampling system. During that period, the facility, including the cooling tower, did not operate and remains in a maintenance outage.

We are providing this notification as courtesy to explain readings during this period.

If you have any questions or require additional information, please contact Rosemary Silva, EHS Project Manager III, at 408-361-4954 or silvaro@calpine.com.

Sincerely,

DocuSigned by:
Kevin Karwick
C4DF598531F14B6...

Kevin Karwick
Designated Representative and General Manager
Metcalf Energy Center, LLC

CC: Region IX, EPA via email attachment
Anwar Ali, CEC AQ-34 via email attachment
EHSWalnutCreek@calpine.com via email attachment
CICS INC103164